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**Jefferson County Planning and Zoning Department,
Michael Smyth, AICP, Planner, April 14, 2003.**

April 14, 2003

Roselle Drahushak-Crow
NEPA Document Manager
DOE Golden Field Office
1617 Cole Boulevard
Golden, CO 80401-3393

Re: Draft Site-Wide Environmental Assessment of NREL South Table
Mountain Complex (DOE/EA 1440)
Jefferson County Case # 02-015051RP

Review of the materials provided yielded the following comments:

Current Planning:

Development in this area should be compatible with the goals and objectives outlined in the *Jefferson County General Land Use Plan* and the *Jefferson County Zoning Resolution*.

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The area in question is zoned as an A-2 District within Jefferson County. Any development may be reviewed as a Site Approval process, and the applicable permits obtained for any projects undertaken.

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C.3

Estimation of traffic impacts within Jefferson County is generally made with a 20-year horizon. County response to traffic generation and future capital project budgets is based in part on these projections. It would be helpful to have traffic and level of service projections for both major and adjacent local intersections.

} C.4

Development in areas with high visual impact is problematic. Introduction of new structures, lighting, and other development activity on the mesa top or in the areas dedicated as conservation easements will have significant impacts. As was noted in the EAS, both local government and the public are sensitive to development that intrudes into the South Table Mountain viewshed as it currently exists. Confining larger structures to Zones 3 through 6 is a thoughtful approach. Limiting the height, bulk, and visibility of structures in Zone 1 is also helpful.

} C.5

Please consider including a member of the Jefferson County Planning and Zoning Department in the Advisory Committee for NREL development.

} C.6

Jefferson County Department of Health and Environment:

We have completed our review of the Environmental Assessment for site wide expansion of NREL and have the following comments and questions about these specific sections:

Page 2-15 Laboratory Gases / Fuels:

The second paragraph describes hydrogen tank storage outside of the building, a dedicated Silane storage area located on the north side of the building, and a liquid storage cylinder site located outside of the building. The applicant needs to describe the methods that will be used to secure the storage areas of these tanks.

C.7

Page 2-17 Construction of New and Modification of Existing Facilities and Research Areas:

Along with the Spill Prevention Control and Countermeasure (SPCC) Plan, are there any other protective devices to be added to monitor this system?

C.8

Page 2-21 Operation and Maintenance of New and Modified Facilities:

This section states that environmental monitoring on the site would be performed on an as needed basis and could include the monitoring of off-site control areas. This Departments believes that there should be some type of environmental monitoring done on a continual basis due to the materials stored and used on site.

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Page 3-25; Section 3.4.2 Existing Noise Levels and Sources:

It appears that even without a study, the noise issues are of concern to NREL. They have identified and researched this issue. Outside of any alterations to the construction process or traffic flows, the noise levels have been addressed. This Department believes that it would be advantageous to the applicant to monitor these levels both during and after the construction process.

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Page 3-59, Section 3.10.1 Hazardous Materials:

Page 3-60, Section 3.10.2 Hazardous and Non-Hazardous Wastes:

NREL has developed a comprehensive plan for waste storage, recycling, and disposal in order to reduce and eliminate waste that must be removed and taken to the landfill. The applicant needs to address how these materials are tracked.

C.12

Page 3-67, Section 3.11.4 Sewage Disposal System:

The existing mesa top facility has a septic tank and leach field system, which serves one toilet, one hand sink and one janitor's sink. The Jefferson County Department of Health and Environment (JCDHE) has no record of this system. If possible, it would be appreciated if copies of old permits and other associated paperwork would be forwarded to JCDHE at 1801 19th Street, Golden Colorado 80401, to the attention of Mindi Ramig.

C.13

Page 4-3, Section 4.1.2 Compatibility with Applicable Local Plans, Policies, and Anticipated Future Development:

As stated in the document, local government plans and policies are not applicable to federal lands such as this site. It was explained that South Table Mountain wants to work with local governments and others. They did send out requests for input from these parties concerning the construction. This Department might have missed the fact that the contracted fire service provider was also notified of the changes to the site. From our understanding the contracted agency is West Metro Fire Protection District. We would like to see their comments, or point out to us the section that we missed that includes input from them.

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C.15

Page 4-15, Section 4.3 Air Quality:

If for an unknown reason emissions were to exceed expected ambient air quality standards or substantially impact regional air quality, a tool should be available to notify the Colorado Department of Public Health and Environment (CDPHE) and the JCDHE.

} C.16

Page 4-16, Section 4.3.2 Construction Impacts:

NREL's Particulate Emissions Control Plan will be an essential part of the construction process due to the high winds the area is noted to have, which usually blow across the site into residential areas. Their plan has been approved by the State and assigned Permit Number 00JE0009L. Please provide information as to whether this will be monitored on a continual basis after construction.

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Page 4-24, Section 4.6.1 Surface Water and Stormwater Impacts:

This Department did not observe in this section that the Jefferson County Stormwater Coordinator had been consulted by NREL or had reviewed this assessment. We would suggest that a copy of this report be forwarded to the coordinator, Michelle Delaria (303.271.8454), for review and input.

} C.18

Page 4-35 SPCC Plan:

NREL has developed a SPCC plan to have on site in the case of spills or releases. No further mention was made as to the amount of training employees would have to implement this plan. It would be advantageous to JCDHE that a copy of this plan and training procedures or policies be forwarded to JCDHE 1801 19th Street Golden, Colorado 80401 to the attention of Mindi Ramig.

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C.20

These were the items that were noted as we reviewed the document, if there are any questions or concerns please feel free to contact us.

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Zoning Administration:

We do not exercise jurisdiction over any Federal projects, and we would not review any plans or issue any permits on the STM site. The following except is from the document that pertains to the County zoning issue.

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"4.1.2 Compatibility with Applicable Local Plans, Policies, and Anticipated Future Development

Although the local government plans and policies are not applicable to federal lands such as the STM site, the following discussions compare the proposed development with local government zoning designations and characterize land use and planning issues that future on-site and off-site development may present.

The planned improvements would be considered office or research and development uses, which is inconsistent with the A-2 zoning designation placed on the site by Jefferson County. However, since the proposed uses are consistent with historical and anticipated uses of the site and given that local government policies do not apply to the site, this difference would not be considered a significant impact. In addition, it is anticipated that building setbacks, particularly within Zones 3, 5, and 6, would be generally consistent with local zoning standards and would provide adequate transitions between residential uses and new buildings. These setbacks will vary and will be determined during the site planning process and/or during the final design processes for individual buildings. The conservation easement, as well as utility and trail easements throughout the site, will be preserved. Access via the trail easement corridor through the unsecured portions of the site between the mesa top and off-site residential and park areas will remain open to the public."

Engineering Geologist:

I have reviewed the Draft Site Wide Environmental Assessment for the NREL at South Table Mountain and I have no additional comments.

Long Range Planning:

Recommendations and Comments:

- The General Land Use Plan does not make a specific recommendation for this area. Rather, it is labeled as Camp George West. The proposed expansion does not seem to be out of compliance with the Plan's recommendations or assumption that this area would remain the same type of use as it is currently.

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Site Planning Process...

- We would like a copy of the draft Site Development Plan mentioned in this section.

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Site Development Zones

- Zone 1 should not allow for additional office or laboratory space. We feel that the expansion of SRRL would cause a lot of community concern and anger. Any facilities or equipment should not be lighted.
- Zone 7- Is this area (or will this area be) accessible to the public? How are these cultural resources integrated in the 25-year master plan?

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Science and Technology Facility

- Will the expanded facility be reliant on water from Consolidated Mutual? The EA mentions upgrade of domestic water system (p. 2-20) Did the EA consider the availability of water in the entire region?

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Site Development, Occupancy, and Phasing

- The increase in employment is in compliance with the County's recent efforts to increase the number of jobs in Jefferson County

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Applicable Local Plans, Policies and Anticipated Future Development Jefferson County

- The first paragraph is incorrect, as it confuses GLUP with zoning. It should read:
The Jefferson County General Land Use Plan (GLUP), adopted in 1986, provides policies and land use recommendations for the STM site. GLUP does not provide a specific land use recommendation for the STM site, rather it states the area as Camp George West. The General Land Use Plan is currently being updated, and is expected to be adopted in Fall 2003.

The STM site is currently zoned A2, which permits "general farming, ranching, intensive agricultural uses and agriculturally related uses while protecting the surrounding land from any harmful effects." The minimum lot size for the A2 zone district is 10 acres.

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- The intent of the PD AMD district in the City of Lakewood is not listed. It would be different than Jefferson County's PD zone district intent.

C.32

- Lakewood and Golden have an Intergovernmental Agreement designating the areas that will be annexed into either city. The STM site is dissected in this agreement. The County does not compel properties to annex in order to develop.

C.33

Traffic and Circulation

- Does the traffic study identify the need for access to the main gate from Isabell Street? Does Isabell need to be completed to help traffic flow? Can I get a copy of the traffic study? Completing Isabell Street will be studied in the process for updating GLUP.

C.34

Cultural Resources

- This section states the DOE/NREL is consulting with the State Historic Preservation Office. I recommend also consulting with Jefferson County Historical Commission.

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Environmental Consequences

Land Use Impacts

- Who comprises the NREL Design Advisory Board? It may be good to include a representative from Jeffco on this Board (for unclassified project review).
- A five-story height limit exceeds other uses in the area. A five-story building may block views to South Table Mountain.
- More thought to the impacts to the existing homes should be included in the EA. This will be a big point of controversy with the public.

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Social and Economic Impacts

- The EA states that no concentrations of minority or low-income populations are located in the vicinity of the site. This is incorrect. The median household income for the area south of the Visitors Center is \$52,422 while the County median household income is \$57,339.

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Matrix

The increase of impervious surfaces does not seem to be considered in the EA or the matrix. Impervious surfaces contribute to non-point pollution, changes to natural drainage flow, ground water recharge, and urban heat.

} C.42

Jefferson County Open Space:

The Open Space Department reviewed this case and had no comments.

Conclusion:

Please call me at 303.271.8719 or e-mail at msmyth@jeffco.us with any questions.

Sincerely,

Michael Smyth, AICP